


1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

4 EVELYN L. McKINLEY,)
5 Plaintiff,)
6 vs.) Civil Action
7 HONORABLE LES BROWNLEE,) No. 04-222 E
8 ACTING SECRETARY OF THE)
9 ARMY,)
Defendant.)

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 ORIGINAL

13 CHARLES R. BRUMBAUGH, a witness
14 herein, called on behalf of the Plaintiff for
15 examination, taken pursuant to the Federal
16 Rules of Civil Procedure, by and before Denise
17 E. Grumski, Registered Professional Reporter
18 and Notary Public in and for the Commonwealth
19 of Pennsylvania, at 99th RSC ECS #103(G), 6467
20 Mike Wood Boulevard, Conneaut Lake,
21 Pennsylvania, on Wednesday, July 20, 2005 at
22 9:02 a.m.

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25

**PLAINTIFF'S
EXHIBIT**

tabb
10

1 C. Brumbaugh - by Mr. Sanders

2 Q. When you use this word mechanic, is
3 that interchangeable with the mobile equipment
4 operator?

5 A. Yes, sir.

6 Q. Jimmie Keener, are you familiar with
7 that name?

8 A. Yes, sir.

9 Q. Ed Stone?

10 A. Yes.

11 Q. Dick Moss?

12 A. Yes.

13 Q. Marge White?

14 A. Yes.

15 Q. Now, Morell, did he have a nickname
16 Mickey?

17 A. Yes, sir.

18 Q. Were you aware from working with Eve
19 McKinley that she had been detailed in 1998,
20 October of '98, to February 14th of 2000 as a
21 supply clerk?

22 A. Yes.

23 (Deposition Exhibit No. 1 was
24 marked for identification.)

25 Q. Let me show you what we've marked as

1 C. Brumbaugh - by Mr. Sanders

2 Brumbaugh Exhibit No. 1. This is a memo from
3 Keener to McKinley on the Franklin,
4 Pennsylvania letterhead. Do you have that
5 document in front of you?

6 A. Yes, sir.

7 Q. And take a moment, if you would, and
8 read this to yourself.

9 A. Yes, sir.

10 Q. Have you had a chance to do that?

11 A. Yes, sir.

12 Q. Do you know who the Wood is that Keener
13 is referring to?

14 A. Perry Wood, III. He is like at the
15 present time activated.

16 Q. If I tell you that Perry before he was
17 activated was Don Whetzel's supervisor here at
18 ECS 103, do you know that to be accurate?

19 A. Yes.

20 Q. And Perry is, what, P-e-r-r-y?

21 A. Yes. Yes, sir.

22 Q. This position that they're referring to
23 that Eve McKinley was given as a supply clerk,
24 do you understand that position eventually was
25 given to Don Whetzel?

1 C. Brumbaugh - by Mr. Sanders

2 A. Yes.

3 Q. Now, this says Franklin, in the
4 letterhead, Pennsylvania. Were you aware at
5 some point between '98, October, and February
6 of 2000 that you all moved from Franklin to
7 Geneva?

8 A. Yes, we did.

9 Q. When that move occurred, Eve McKinley
10 continued that supply clerk position until
11 Whetzel came to Geneva?

12 A. Yes. The only thing is I didn't work
13 here as long. I was still working Franklin
14 back and forth moving equipment, and I didn't
15 really start here until about middle of January
16 of 2000 because of our constant rotation of
17 equipment.

18 Q. My point is that when Eve was given
19 this position, she was taken away from working
20 for you as a mobile person mechanic, as you
21 call it, and put on this supply clerk position;
22 was she not?

23 A. Yes, sir.

24 Q. And when that happened, to your
25 knowledge, if you remember, were there